

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**IN RE:**

**CLINT ALLEN DRAPER**

**Case No. 18-13346-KHK  
Chapter 7**

**Debtor.**

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**CARRINGTON MORTGAGE SERVICES, LLC**

**Movant,**

**v.**

**CLINT ALLEN DRAPER**

**and**

**H. JASON GOLD, Trustee**

**Debtor**

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

COMES NOW the Debtor, Clint Allen Draper, and, by Counsel, for his answer to the motion for relief from stay filed against him herein by Movant, ("the Motion") states as follows:

1. The Debtor admits the allegations of Paragraphs 1, 2, 3, 4, 5, 6, and 7 of the Motion.
2. The Debtor denies the allegations of Paragraph 8 of the Motion, and avers that he has made each payment due from December 2018 through April 2019.
3. The Debtor does not have sufficient knowledge or information to either admit or deny the allegations of Paragraph 9 of the Motion, and therefore he denies the same and demands strict proof thereof.

4. Upon information, the Debtor denies the allegations of Paragraphs 10 and 11 of the Motion.

5. The Debtor admits the allegations of Paragraph 12 of the Motion.

WHEREFORE, having fully responded, Debtor prays that the Motion be denied and that he may have his costs and fees expended herein.

CLINT ALLEN DRAPER

Debtor  
By Counsel

/s/Robert B. Easterling  
Robert B. Easterling

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CERTIFICATE OF SERVICE

I, Robert B. Easterling, do hereby certify that I have served a true copy of the enclosed Response to Motion for Relief from the Automatic Stay by electronic service using the ECF Filing System on this 25<sup>th</sup> day of April 2019 to Malcolm Brooks Savage III of Shapiro and Brown, LLP and to H. Jason Gold, Trustee, at their internet addresses registered with the Court.

/s/Robert B. Easterling  
Robert B. Easterling